

# **PLAINTIFF'S EXHIBIT I**

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

LATHIERIAL BOYD, )

Plaintiff, )

vs. ) Case No. 13 C 7152

CITY OF CHICAGO, CHICAGO )

POLICE OFFICER RICHARD )

ZULEY, star no. 15185; )

CHICAGO POLICE OFFICER )

LAWRENCE THEZAN, star )

no. 9419, CHICAGO POLICE )

OFFICER STEVE SCHORSCH, )

star no. 8955; CHICAGO )

POLICE OFFICER JOHN )

MURRAY, star no. 3175; )

CHICAGO POLICE OFFICER )

WAYNE JOHNSON, star no. )

4266; and RAY KAMINSKI, )

as special )

representative of the )

Estate of former CHICAGO )

POLICE OFFICER ANDREW )

SOBOLEWSKI, )

Defendants. )

The deposition of SHELLEY KEANE, called for examination pursuant to the Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken before JENNIFER M. DALY, a certified shorthand reporter within and for the County of Cook and State of Illinois, at 77 West Wacker Drive, Suite 3100, Chicago, Illinois, on the 15th day of December, 2015, at the hour of 10:10 a.m.

REPORTED BY: JENNIFER M. DALY, RPR, CSR  
LICENSE NO.: 084-004688

1           Q.     Did you attempt to interview  
2 Steve Schorsch?

3           A.     No.

4           Q.     Did you attempt to interview  
5 Ralph Sikorski?

6           A.     No.

7           Q.     Did you attempt to interview  
8 John Murray?

9           A.     No.

10          Q.     Did you attempt to interview  
11 Wayne Johnson?

12          A.     No.

13          Q.     Did you attempt to interview Dick Zuley?

14          A.     Yes.

15          Q.     Tell us about that.

16          A.     I asked the investigators to attempt to  
17 get a number for him or a location, and they were  
18 able to get me a phone number. I called the number  
19 and left a message with him to call me back. I  
20 never received a response.

21                 I asked the investigators to go to -- I  
22 believe he was working at the Department of Aviation  
23 at the time, if they could go meet with him, explain  
24 what was going on, if he would be willing to speak

1 with me. He did not want to speak with me.

2 Q. You asked your investigators to explain  
3 to Detective Zuley what was going on?

4 A. Just that it was about -- in regards to  
5 the Lathierial Boyd case, and that I wanted to talk  
6 to him from the Conviction Integrity Unit.

7 Q. And do you know if they delivered that  
8 message to Detective Zuley?

9 A. Specifically what words were said by the  
10 investigators to Detective Zuley, I do not know  
11 that.

12 Q. Did you ever personally yourself speak  
13 to Detective Zuley?

14 A. No.

15 Q. In 2008, Mr. Boyd filed a petition for  
16 writ of habeas corpus in federal court, Cook County  
17 State's Attorney's Office again defended the matter  
18 and the underlying conviction.

19 Did you or the Integrity Unit review the  
20 briefs filed in relation to that petition?

21 A. I don't recall reviewing the briefs on  
22 that, but I can't say for sure.

23 Q. Boyd appealed that denial -- strike  
24 that.



1                   MR. NOLAND: Excuse me, I believe she  
2           was --

3           BY MS. ZELLNER:

4           Q.       -- victim --

5           MR. NOLAND: -- answering still, and  
6           you cut her off.

7           MS. ZELLNER: Well, I think her  
8           attorney can make that kind of objection.

9           BY MS. ZELLNER:

10          Q.       Please, go ahead.

11          MS. MEADOR: Were you done? As long  
12          as you're not talking about weight and  
13          credibility determination that you made --

14          THE WITNESS: Right. Yeah.

15          MS. MEADOR: Okay.

16          BY MS. ZELLNER:

17          Q.       So what was your answer -- you said  
18          Ricky Warner -- everyone knew Ricky Warner was a  
19          quadriplegic, correct?

20          A.       Right.

21          MS. MEADOR: Objection; speculation.

22          BY MS. ZELLNER:

23          Q.       Did you know Ricky Warner was a  
24          quadriplegic before his death?

1           A.     Yes.

2           Q.     Did you know that quadriplegics cannot  
3 sign or move their arms, can't move their arms?

4           A.     Yes.

5           Q.     Okay. So when Detective Thezan told you  
6 that Ricky Warner had signed a photo array, did  
7 that -- was that consistent with what you knew  
8 Ricky Warner's condition to be?

9           A.     No.

10          Q.     And anywhere in all of your review of  
11 the prior witness interviews, had Detective Thezan  
12 ever made that statement to anyone else, as far as  
13 you know?

14          A.     No.

15          Q.     You were not the -- as you've stated  
16 previously, you were not the ultimate decision-maker  
17 in this case about whether Lathierial Boyd's  
18 conviction would be vacated, correct?

19          A.     Correct.

20          Q.     And you were not the ultimate  
21 decision-maker on whether the State's Attorney would  
22 oppose a petition for a certificate of innocence,  
23 correct?

24          A.     Correct.